

**WINSTON LEE  
ATTORNEY AT LAW  
20 VESEY STREET ~ SUITE 400  
NEW YORK, NEW YORK 10007**

—  
**Tel. (212)267-1911  
Fax. (212)964-2926**

August 12, 2014

The Honorable William H. Pauley III  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Filed ECF

Re: United States vs. Rasheem Riley, et al.  
14 Cr. 498 (WHP)

Dear Judge Pauley:

I write as counsel for Mr. Rasheem Riley, a defendant in the above-referenced case.

This letter is respectfully submitted, in advance of Mr. Riley's detention hearing on August 18, 2014, at 11:30 A.M., to provide the Court with information about the bail package being proffered by defendant, and about other matters relevant to the issue of bail.

**I. Background**

On July 30, 2014, upon his presentment before Magistrate Judge Debra Freeman, Mr. Riley pleaded not guilty to the above referenced indictment in which he is charged in Count One with the crime of conspiracy to distribute and possess with intent to distribute and possess with intent to distribute 280 grams and more of crack cocaine. Mr. Riley is not charged in the additional three counts of the indictment alleging firearms offenses or Hobbs Act robbery.

Mr. Riley consented to an order of detention without prejudice to his making a future bail application.

Mr. Riley is a lifelong resident of New York and has significant ties to New York. As set forth below, seven people have unequivocally come forward and offered to act as sureties for Mr. Riley, each confident that he will abide by any terms and conditions imposed by this Court should he be released on bond.

**II. Proposed Bail Package**

It is respectfully requested that Your Honor release Mr. Riley on a substantial and restrictive bond secured by the assets and assurances of the following seven financially responsible persons and including, at a minimum, the restrictive conditions described below.

Hon. William H. Pauley III  
August 12, 2014  
Page (2) Two

U.S.A. v Rasheem Riley  
14 Cr. 498 (WHP)

Co-signers Of The Bond

Mr. Riley proffers the following seven financially responsible co-signers of the bond. Each of the co-signers is a very close friend or relative of Mr. Riley, who is gainfully employed. Their combined annual income is over \$250,000.00 dollars, and each one is a United States Citizen:

1.     Name:                     Mr. Cecil Pressley (brother in law of the defendant)  
       Residence:            New York  
       Employer:             Trade Off Construction Company, New York  
       Job Title:             Construction Worker, Full Time  
       Years at Company:    10 years  
       Annual Salary:        Approximately \$35,000/year
  
2.     Name:                     Ms. Lovely O'Neal (girl friend of defendant)  
       Residence:            New York  
       Employer:             Western Beef Company, New York  
       Job Title:             Clerk, Bakery Department, Full Time  
       Years at Company:    2 years  
       Annual Salary:        Approximately \$20,000/year
  
3.     Name:                     Mr. Andrew Santana (friend of defendant)  
       Residence:            New York  
       Employer:             Empire Merchants Company, New York  
       Job Title:             Truck Driver  
       Years at Company:    2 years  
       Annual Salary:        Approximately \$60,000/year
  
4.     Name:                     Mr. Jason Santana (friend of the defendant)  
       Residence:            New York  
       Employer:             U.S. Postal Service  
       Job Title:             Letter Carrier  
       Years at Company:    9 years  
       Annual Salary:        Approximately \$56,000/year
  
5.     Name:                     Ms. Annette Ingram (friend of the defendant)  
       Residence:            New York  
       Employer:             Citifield (Shea Stadium)  
       Job Title:             Maintenance/Housekeeping Staff  
       Years at Company:    25 years  
       Annual Salary:        Approximately \$27,000/year

Hon. William H. Pauley III  
August 12, 2014  
Page (3) Three

U.S.A. v Rasheem Riley  
14 Cr. 498 (WHP)

6.     Name:                   Ms. Keisha O'Neal (friend of the defendant)  
       Residence:           New York  
       Employer:           Fairway Market, New York  
       Job Title:           Baker  
       Years at Company:   2 years  
       Annual Salary:      Approximately \$19,500/year
- \_\_\_\_\_ 7.     Name:                   Lisa Saintcloud (friend of the defendant)  
       Residence:           New York  
       Employer:           NYC Human Resources Administration, Social Services  
                                  Dept.  
       Job Title:           Job Opportunity Specialist  
       Years at Job:        One year  
       Annual Salary:      Approximately \$35,740.00/year

#### Additional Conditions of Release

Defendant agrees to be subjected to the following conditions/restrictions during his release:

1.     Strict Pretrial Services supervision. Mr. Riley also agrees to home detention with an ankle bracelet if the Court decides this is necessary;
2.     Drug testing and monitoring (as required by Pretrial Services);
3.     Travel restricted to SDNY, EDNY;
4.     Surrender any travel documents, and not to apply for any new travel documents;
5.     No contact or associating with co-defendants except in the presence of counsel;
6.     Any other conditions as the Court deems appropriate and necessary.

### **III. Conclusion**

The substantial and restrictive bail package proposed by defendant more than adequately addresses any concerns regarding risk of flight or danger to the community.

Mr. Riley's family and friends are prepared to come before this Court where they intend to stake their financial futures on the presence of the defendant at each and every court appearance. Each potential surety understands that they will be jointly and severally liable for the entire amount of the bond should Mr. Riley fail to return to court. Mr. Riley, a United States citizen, will appear in court when required to do so, comply with all the restrictive conditions imposed by this Court and cooperate with United States Pre-Trial Services. He understands that his failure to return to court would result in the financial ruin of his family and friends and would result in additional charges being levied against him.

Hon. William H. Pauley III  
August 12, 2014  
Page (4) Four

U.S.A. v Rasheem Riley  
14 Cr. 498 (WHP)

Accordingly, at the conclusion of the bail hearing on August 18, 2014, Mr. Riley will respectfully request that the Court grant him bail in accordance with bail package outlined above.

\_\_\_\_\_  
Respectfully submitted,

\_\_\_\_\_  
/s/  
WINSTON LEE

cc: Andrea Griswold  
Assistant U.S. Attorney  
(By e-mail)